

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

DEIRDRE BAKER, individually and on behalf of all others similarly situated,) Civil Action No. 0:17-cv-02364-MBS
Plaintiff(s),)
vs.)
LANIER COLLECTION AGENCY)
& SERVICES, INC.,)
Defendant.)

)

**DEFENDANT LANIER COLLECTION AGENCY & SERVICES, INC.'S MOTION TO
DISMISS PLAINTIFF'S COMPLAINT PURSUANT TO RULE 12(b)(6) OF THE
FEDERAL RULES OF CIVIL PROCEDURE**

NOW COMES Defendant, Lanier Collection Agency & Services, Inc. ("LCA"), and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure moves for dismissal of Plaintiff's Complaint for failure to state a claim upon which relief can be granted.

WHEREFORE, LCA respectfully asks that this Court issue an Order granting its Motion and dismissing Plaintiff's Complaint with prejudice and charging all fees and costs to Plaintiff.

Dated: November 21, 2017

Respectfully submitted by:

/s/ Chad V. Echols
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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2017, a true and correct copy of the foregoing was served on counsel for Plaintiff via the USDC ECF system as follows:

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